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July 1, 2024

VIA ECF

Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Colantuone v. NYC Health and Hospital Corp. (d/b/a Harlem Hospital Center)
24-cv-00242-AT

Dear Judge Torres:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and attorney for Defendant New York City Health and Hospitals Corporation d/b/a NYC Health + Hospitals (sued here, incorrectly as “NYC Health and Hospital Corp. (d/b/a Harlem Hospital Center”) (“Health + Hospitals”), in the above-referenced action. I submit this letter as a status update in the above-referenced action and to request that the upcoming deadlines to exchange information in preparation for mediation, engage in mediation, submit a joint letter and case management plan, and respond to the Complaint¹ be stayed, and for the parties to submit a status report to the Court in 30 days. I contacted Plaintiff’s counsel about this request, and Plaintiff’s counsel stated “We can consent to [a stay of] 30 days.”

In the Complaint, Plaintiff alleges that Health + Hospitals employed Plaintiff as a nurse. See Compl. ¶¶ 14, 19. However, that allegation, as Plaintiff is undoubtedly aware, is incorrect. Plaintiff was, at all relevant times, employed and paid by Cynet Health Inc. (“Cynet”), a temporary staffing vendor.

We respectfully request a stay because Health + Hospitals is currently working to resolve legal representation issues in this matter. Pursuant to the terms of relevant agreements, Health + Hospitals has sought representation in this litigation from Cynet and another party. The resolution of this issue is necessary so that Health + Hospitals can determine who will be representing it in this litigation (i.e., the Corporation Counsel or a third-party law firm). At this

¹ There is currently no deadline for Health + Hospitals to respond to the Complaint.

time, Health + Hospitals, Cynet, and another relevant party are still discussing the issue, and we are hopeful that the issues of representation will be resolved and/or determined within thirty days.

In light of the foregoing, we respectfully request that the Court stay the deadlines in this case, which includes exchanging information in preparation for mediation, engaging in mediation, submitting a joint letter and case management plan, and responding to the Complaint. If this request is granted, we will submit a status report in thirty days to update the Court regarding the representation issue.

I thank the Court for considering this request.

Respectfully submitted,

/s/ Madeleine A. Knutson

Madeleine A. Knutson, Esq.
Assistant Corporation Counsel

cc: All counsel (By ECF)

GRANTED. The case is STAYED until **August 1, 2024**. Health + Hospitals shall submit a status report regarding representation on that date.

SO ORDERED.

Dated: July 2, 2024
New York, New York



ANALISA TORRES
United States District Judge